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Counsel for Bay Point Capital Partners II, LP

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	 §	Chapter 11
ENNIS I-45 11 ACRE, LLC,	9	Case No. 25-31219-mvl11
Debtor.	§ §	
	§	

## NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that the undersigned hereby enters his appearance pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 9010(b) in the above-captioned case as counsel to **BAY POINT CAPITAL PARTNERS II, LP** a creditor and party-in-interest in the above-captioned case, and requests that, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and sections 342 and 1109(b) of the Bankruptcy Code, all notices given or required to be given in this case be given and served upon:

Jeff P. Prostok

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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes the notices and papers referred to in the Rules and sections cited above, and also includes, without limitation, orders and notices of

any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, facsimile, electronically or otherwise filed or served with regard to the referenced case and proceedings therein.

This Notice of Appearance shall not be deemed or construed to be a waiver of any rights, including, without limitation, the right (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) any consent to the exercise of the Court's jurisdiction, or (4) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or any other rights, claims, actions, defenses, setoffs, or recoupment in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupment are hereby expressly reserved.

Dated: April 11, 2025. Respectfully submitted,

/s/ Jeff P. Prostok

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COUNSEL FOR BAY POINT CAPITAL PARTNERS II, LP

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served via ECF electronic Notice on April 11, 2025.

<u>/s/ Jeff P. Prostok</u>

Jeff P. Prostok